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CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Angelo Shenault

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

12 C 3475

vs.

Judge James B. Zagel

Magistrate Judge Susan E. Cox

C/o Garcia Cook County

C/o Gabens Cook County

Dr. John Doe Cook County Medical Staff Cermak

Nurse Jane Doe Cook County Cermak

Tom Dart Cook County

Ms DGP NRC Stateville Medical personal

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Angelo Shenault

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: \_\_\_\_\_

(To be supplied by the Clerk of this Court)

Yo John Doe Med-tech Stateville WRC

Jane Doe Nurse Stateville WRC

Mulioth Nurse Vandalia CC

Dr R Ovelade IDoc Pontiac Correctional Center

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

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**I. Plaintiff(s):**

- A. Name: Angelo Shenault
- B. List all aliases: Angelo St. Clair, Darnell Holmes, Darnell M. Holmes
- C. Prisoner identification number: R54546
- D. Place of present confinement: PONTIAC
- E. Address: 700 W Lincoln

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Garcia  
Title: Correctional officer  
Place of Employment: 2650 S. California Cook County Jail Div 2
- B. Defendant: Gabens  
Title: Correctional officer  
Place of Employment: 2650 S. California Cook County Jail Div 5
- C. Defendant: Dr. John Doe  
Title: Doctor  
Place of Employment: 2800 S. California Cook County Jail Cermak

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. Defendant Jane Doe

Title Medical Staff Cermak 2800 S. California

Placement of Employment Cook County Cermak Jail

E. Defendant Tom Dart

Title Cook County Sheriff

Place of Employment Cook County Jail 2650 S. California

F. Defendant ms DGP

Title Medical Personal

Placement of Employment NRC Stateville C.C. 16800 Broadway  
Joliet IL 60434

G. Defendant c/o John Doe

Title Correctional officer

Placement of Employment NRC Stateville C.C. 16800 Broadway  
Joliet IL 60434

H. Defendant Jane Doe

Title Nurse Medical Personal

Placement of Employment NRC Stateville C.C. 16800 Broadway  
Joliet IL 60434

I. Defendant Mulioth

Title Nurse

Placement of Employment Vandalia C.C. Rt. 51 North Box 500

J. Defendant Dr. R. Ojelade

Title Doctor

Placement of Employment Pontiac C.C. 700 W. Lincoln Pontiac, IL 61764

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: N/A
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: N/A
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: N/A
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A
- I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

1. After being shot I was transferred to the north western Memorial hospital and was operated on. I was shot in the back. Later after surgery I was arrested. the Gunshot entering was 2 inches from my heart and coming from my spine coming out my lungs was weak. I barely could walk I was discharged to Chicago Police.
2. I was transferred to Cook County Jail despite my condition I had stitches in my chest and I had a breathing apparatus machine. I was placed in Cermak health care unit a ICU sort Doctor said he needed to monitor me due to the type of injury. I coughed up blood and mucus the pain felt so bad I cried and tried to yell I was given some Pain Pills about 9 hours later I was later given a review but more stronger Pain Pills the next day nothing hours later the Pain shot through my body I could not Sleep or Stand.

3. Cermak Discharged me sending me to Division 2 with nothing but the breathing machine. I complained of the Pain sent in the Medical request Form Filed a grievance. Yet no respond. Doctor John Doe Just stated Your Young Pain is Good for You I am Sending You to Population I told him I am not barely walking breathing and this Pain keeps me up the doctor said You'll be OK C/o he can leave. As I walked slowly and cold due to the Pain. The Officer escorted me to Division 2 Dorm 1. I notice blood bleeding from the stitches and told C/o Garcia. Garcia said I'm not touching you. He never called no one I wrote my mother about the pain and not treatment there was 60 people on the Dorm or more. Finally I was told to go down stairs so I could see the Doctor. I had to walk them stairs despite my condition. I Followed orders.
4. Once saw the doctor I told him that my body is hot and cold blood is in my stooling the stitches hurt and itch I am in pain my arm is also numb. The doctor said take his weight ARE you eating I said not really I keep having nightmares the doctor just started looking at the wounds and wept them

and said the stitches will come out next week Goodbye.

5. The Doctor came in rushing said lay down and he started removing the stitches then told me to leave. My wounds started swelling I told C/o Garcia
6. For Several days as the swelling got bigger I did not know what was wrong. It area was crawling inside I coughed up blood I told Staff and filed grievances and request slips to Medical. I just went to sleep a few days past I keep using the breathing Machine because I could not breathe Good but was walking a little better. I went down stairs. A Fight erupted I got out the way. After Security had secured the Area everything Went back to normal. I had started having difficulty breathing so I walk towards the Stairs. As I got there Midway up. C/o Garcia Said "What the Fuck You think you doing I answered him "I need my breathing Machine up on my bunk C/o Garcia said You Ain't Getting shit Get back down here. I ask him could he get it for me He Said yeah later.
7. AS I set down and waited I ask Garcia where is my Machine, I need a nurse man. Garcia Said ILL get to the healthcare in Cermak in a few minutes. and laughed.
8. I was escorted out to Division 5. thinking I was going to Cermak I was put in a bullpen several more inmates from Division 2 was put in the bullpen our property was begged with our names on it pass by my Name was called and I was put on 1F top deck. No Cermak When I waited for hours C/o Gabens Shown Up I asked him why am I here I need to get to Cermak I cant breath right my chest is swollen, blood is coming out C/o Gabens Said let me see



ILL let the nurse know. Still no nurse came.

9. My Chest Continued to hurt I told a Unknown White officer He contacted the nurse. She called me down ask my problem. I told her She Said ILL Schedule You to see the Dr. I told her the bleeding is caught up I cant breath. the pain feels Like I am being Stabbed and it is crawling. She Sent me back to the wing I wasnt eaten. A Few days later I told Yo Gabens I need to see a nurse. My cellmate Also went and told him Yo Gabens said to me "Aint" nothing wrong inmate. You are young and probably a pill head or Dope FEind You Keep telling me you need a nurse. I am not calling Unless I see blood and you aint moving. Then ILL call.

10. I told Gabens I cant breathe he laughed and walked off. Two days After filing a Grievance I was called down to the dispensary then I told the same Nurse Jane Doe. She Said lay down let me look At you She Saw blood oozing She Said Does it hurt here I told her my Chest and back is Killing me she said yeah I see its Swollen. She had start feeling the wound area and ran across what she said was hair the looked again and said Those are Stitches She took them out and said ILL be seen by the Doctor. She gave me some pain pills and Sent me out. No breathing Machine.

11. On Court Dates I had Mention that I wasn't getting Treatment and thought ILL get treatment in IDOC so I got out of there and I went to IDOC. No Breathing Machine or pain pills.

12. Plaintiff was transferred to stateville Northern Region Center

I was processed and sent to the medical personell. A lady unknown with the initials D.G.P Black Female asks me is there any medical concerns I have I told her Yes I Explain that I been Shot the breathing is hard. I am Experiencing Pain Blood is being caught up and in my stooling I can not stand nor sleep My left arm is numb. I get cold my body shakes feels like I am being stabbed my chest hurts feels like something is crawling inside. she said There is nothing wrong with you boy that is what happen when you get shot I see the scar It is healing but I will schedule for sick call. I never saw anyone It was a holiday. I was told by staff.

13. A few days passed by I still had been feeling the same way I submit the request slips and told each staff pass. that I had caught. about my pain. This White Correctional Officer John Doe with black hair 6'1 on Twings Cell 304 He told me it is the holiday Unless It is a real emergency they want come. So I am not calling them lay ~~down~~ Down. Youre not Dying You look well alive to me.

14. I was sleep the I woke up to pain and cramps I went to the toilet Blood came out my stooling and the cramps got worse. My Cellmate Tristan Jackson Pressed the Panic button but security did not come About 3 hours the pain stop I used the restroom again which had little blood. My nerves was twitching. Each time staff I told them I needed to see a medical personal. I even talked to a Nurse and another.

Medical male. This to said he it is a holiday Man you're just trying to get out that Cell ain't nothing wrong with you. Hey When he's dead or dying then tell the next person. He walked off. This was November 24, 2011. I Filed two Emergency grievances and spoke with the same black nurse Female about 5'9 or 5'10 She said You just want some attention you look Depress, I was.

15. I Felt mentally beaten as well as physically no body responded.

16. A week later I was transferred to Vandalia. There I told the Doctors my constant problem from Cook County Jail to NRC He said I dont see nothing in your chart about You being a gun Shot Victim When Will you be going home. I told her soon She said you'll be Fine. She Didn't even examine me saying to Me. Get treatment When You Go Home. The Pain Stayed without even a Pain Pill. A Inmate gave me Some Tylenol. Breathing remain a problem.

17. On February 8 a altercation occurred a inmate attempt to attack me Several other inmates got involved I could barely walk or breathe so I stayed low. Security come and took us to Segregation prior to they took me to this nurse I told her I cant barely breathe she Said "Oh"um they'll treat you later Your not her for that I was transfer Instantly to Pontiac Correctional Center.

18. After several medical request I saw this Black Doctor name is R. Odelade again I explained my situation that I am in pain can not sleep sit down nor stand for periods of time and breathing is quite difficult. I cough up blood, and it is in my stooling. I was shot in my back my nerve's jump so badly that I feel like I am being stabbed from my chest to my back. He said oh and walked off soon to return then said these are things you'll go through out your life when will you be release I said in may He said I'll give you Motrin you'll be fine are you bleeding now? I told him I don't know but my whole body hurts chills Pins and needles and occasionally... He stop me I am done he can go. Pontiac 2/18/12

19. I told the medtech and shown him blood and that I was in pain I cant Eat I've lost weight. I signed up for sick call 2/28/12

20. On 3/11/12 I signed up for sick call the pain just want go away my lungs hurt.

21. On 3/22/12 I was moved several time but I keep putting in sick call slips and spoke to several staff.

22. On 4/09/12 I spoke with both Warden Pfisher and health care administrator they said they'll have me see on 4/23/12 I filed and emergency grievance.

23. ON APR. 23 2012 I wrote another grievance Yet I stayed in my cell mostly. Cook County didnot tell IDOC my Issue Prior to Sending me to N.R.C. UPON information and Belief

All These STAFF ACTED in color of state and County  
Staff acted in Color of County

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Award Consequential, Compensatory damages  
Punitive damages against the individual Defendants  
in their individual capacities, Costs, Attorney fee  
And whatever relief this Court deems proper

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 25 day of April, 2012

Angelo Shencault

(Signature of plaintiff or plaintiffs)

Angelo Shencault

(Print name)

R54545

(I.D. Number)

Pontiac Correction Center

700 W Lincoln Pontiac IL 61764

(Address)